

BEYS LISTON MOBARGHA & BERLAND LLP
Michael P. Beys

August 4, 2016

VIA ECF & FACSIMILE (212-805-4060)

The Honorable Barbara Moses
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *United States v. Kaleil Isaza Tuzman*, No. S1 15 Cr. 536 (PGG)

Dear Judge Moses:

We are co-counsel to defendant Kaleil Isaza Tuzman, who has been released on bail pursuant to a bail order signed by Magistrate Judge Frank Maas on July 15, 2016 (ECF 69). Currently, Mr. Isaza Tuzman is on home detention with electronic monitoring (via GPS), and his travel is restricted to the Southern and Eastern Districts of New York.

We respectfully submit this letter to seek permission for Mr. Isaza Tuzman to travel to Wayne, Pennsylvania on August 5, 2016, to attend the funeral of his close friend, Howard Lewis. The funeral service will be held at 11:00 am at St. David's Episcopal Church Chapel, 763 Valley Forge Road, Wayne, PA. He would be traveling there by car along with his friend, and a cosigner on his bond, Thomas Stabb. They intend to leave at approximately 7:00 am and to have returned to this district by 4:00 pm tomorrow.

I have spoken with Pretrial Services Officer John Moscato, who is supervising Mr. Isaza Tuzman while on pretrial release, and he has no objection to this request. I have also spoken with Assistant U.S. Attorney Andrea Griswold, and the government consents to this request.

We thank the Court in advance for its consideration.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. Hon. Paul G. Gardephe, U.S.D.J. (via ECF)
All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via email)